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December 19, 2023

Via ECF:

The Honorable Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 12/20/2023

Re: **Morrison et al v. JSP Life Agency Inc. et. al.**
Civil Docket No.: 1:23-cv-06943-VSB

Dear Judge Broderick:

Our office represents the Plaintiff in the above-referenced matter and we respectfully submit this letter as a status report regarding the parties' mediation efforts and as a motion for an extension of time to file the case management plan and joint letter due to the Court on December 20, 2023 (pursuant to the Court's November 6, 2023 Memo Endorsement).

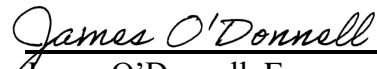
The parties attended Court-annexed mediation on December 13, 2023. Although a settlement was not reached at mediation, the parties are continuing their negotiations through the Court-appointed mediator. Following the December 13, 2023 mediation, the parties agreed to an additional exchange of information and documentation regarding certain claims and defenses raised and have agreed to make that exchange by January 10, 2024.

Further, the parties have scheduled a second mediation with the Court-appointed mediator on January 24, 2024 after this additional exchange of information.

As such, we also submit this letter as a joint motion for an extension of time to file the case management plan and joint letter. The parties request that the deadline to file be extended to January 31, 2024 – one week after mediation – should the matter not be resolved at the second mediation. This is the second request for an extension of time to file these documents and this request will not affect any other dates or deadlines.

We thank The Court for its kind consideration on this matter and we remain available to provide any additional information.

Respectfully submitted,


James O'Donnell, Esq.

CC via ECF:

Attorneys for Defendants